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February 18, 2025

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. James M. Wicks, U.S.M.J.
100 Federal Plaza, Courtroom 1020
Central Islip, NY 11722-4438

Re: Superb Motors Inc, *et al.* v. Deo, *et al.*
Case No.: 2:23-cv-6188 (JMW)

Dear Judge Wicks:

This office represents Plaintiffs Superb Motors Inc. (“Superb”), Team Auto Sales LLC (“Team”), and Robert Anthony Urrutia (“Urrutia”) (Superb, Team, and Urrutia collectively hereinafter the “Superb Plaintiffs”) in the above-referenced case. Superb writes to respectfully request an extension of time of two (2) weeks to oppose the Deo Defendants’ third letter motion for contempt.

Legal Standard

Rule 6 of the Federal Rules of Civil Procedure (hereinafter referred to as “Rules” or “Rule”) provides that “[w]hen an act may or must be done within a specified time, the court may, for good cause, extend the time ... with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expire.” See Fed. R. Civ. P. 6(b)(1)(A).

Further, Rule 1 provides that the Rules should be construed, administered, and employed by the court and the parties to secure the just, speedy, and inexpensive determination of every action and proceeding. See Fed. R. Civ. P. 1.

Good Cause and the Just, Speedy, & Inexpensive Determination of this Case Warrant an Extension

Consistent with ¶ 1(D) of this Court’s Individual Practice Rules, Superb respectfully submits that: (i) the original date the Superb Plaintiffs have to respond to the third letter motion for contempt is tomorrow, February 19, 2025; (ii-iii) there have been no previous requests for an extension of this deadline; (iv) an extension of time is necessary because your undersigned was traveling out of the state from Thursday, February 13, 2025 through Sunday, February 16, 2025 and was conducting a deposition today in an unrelated action; and (v) the Deo Defendants only consent to an extension of time until February 28, 2025 rather than March 5, 2025 because of “serious nature of the issue raised by the Deo Defendants’ letter motion, coupled with the fact that the Court already afforded the Superb Plaintiffs ten days to file opposition.”

For the foregoing reasons, the Superb Plaintiffs respectfully submit that sufficient good cause exists to warrant this Court’s exercise of discretion in favor of granting the requested extension of time.

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The Superb Plaintiffs thank this Court for its time and attention to this case.

Dated: New Hyde Park, New York
February 18, 2025

Respectfully submitted,

SAGE LEGAL LLC

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